# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

In Re:	)	
	)	
OKLAHOMA FORGE, LLC, d/b/a	)	Case No. 24-11060-T
OKLAHOMA FORGE, INC.	)	Chapter 11
	)	-
Debtor.	)	

## **DEBTOR'S WITNESS AND EXHIBIT LIST**

Oklahoma Forge, LLC, as Debtor and Debtor in Possession (the "<u>Debtor</u>") submits this Witness and Exhibit List with respect to the evidentiary hearing to be held on April 30, 2025, at 9:00 a.m. CDT to consider Debtor's *Motion for an Order (1) Authorizing Sale of Substantially all of the Debtor's Assets Free and Clear of All Liens, Claims, Encumbrances and other Interests, (2) Approving Distribution of Sale Proceeds and (3) Granting Related Relief (the "<u>Sale Motion</u>") filed April 14, 2025 [Doc. No. 317]:* 

#### **WITNESS LIST**

The Trustee may call one or more of the following witnesses:

No.	Witness	Anticipated Testimony
1.	James J. Connor	See Declaration of James J. Connor, dated December 12, 2024 [Dkt. No. 91], Declaration of James J Connor in Support of the Sale Motion [Dkt. 216] and Declaration of James J. Connor in Support of Private Sale Motion to be filed.
2.	David R. Payne	See Declaration of David R. Payne in support of the Sale to be filed.
3.	Jeff Jones, managing member of Forge Resources Group, LLC	See Declaration of Jeff Jones filed February 18, 2025 [Doc. 222]
4.	Any witness called by any other party	
5.	Witnesses for rebuttal	
6.	Witnesses for impeachment	

# **EXHIBIT LIST**

Exhibit No.	Identification	Objection	Basis of Objection	Admit	Deny
Debtor's	Declaration of James				
Exhibit 1	J. Connor in Support				
	of Sale (to be filed)				
Debtor's	Declaration of David				
Exhibit 2	R. Payne in Support of				
	Sale (to be filed)				
Debtor's	Second Notice				
Exhibit 3	Regarding Successful Bidders [Doc. 313]				
Debtor's	Proposed Sale Order				
Exhibit 4					
Debtor's	Revised FRG Asset				
Exhibit 5	Purchase Agreement				
	(Attached to EX 4 as				
	Debtor's EX 3]				
Debtor's	Transcript Hearing on				
Exhibit 6	March 17, 2025				
Debtor's	Declaration of Jeff				
Exhibit 7	Jones filed February				
	18, 2025 [Doc. 222]				
Debtor's	Supplemental				
Exhibit 8	Declaration of Jeff				
	Jones, to be filed.				
Debtor's	Reserved				
Exhibit 9					
	Any exhibit listed or				
	offered by any other				
	party				
	Exhibits for rebuttal				
	Exhibits for				
	impeachment				

Respectfully submitted,

s/Mark A. Craige

Mark A. Craige, OBA #1992 Alexander Sokolosky, OBA #33614

-Of the Firm-

CROWE & DUNLEVY
A Professional Corporation
222 North Detroit Avenue
Suite 600
Tulsa, OK 74120
(918) 592-9800
(918) 592-9801 (Facsimile)
mark.craige@crowedunlevy.com
alex.sokolosky@crowedunlevy.com

Attorneys for Oklahoma Forge, LLC, Debtor In Possession.

## **Certificate Of Electronic Service**

The record herein reflects that on the same day this pleading was electronically filed, a copy was electronically served upon counsel of record and other parties as shown in the record herein.

/s/Mark A. Craige